

# STOP ANNOUNCEMENTS

THIS SERIES OF TOPIC GUIDES INCLUDES:

- 1** Equipment Maintenance
- 2** Stop Announcements and Route Identification
- 3** Eligibility for ADA Paratransit
- 4** Telephone Hold Time in ADA Paratransit
- 5** Origin To Destination Service in ADA Paratransit
- 6** On-Time Performance in ADA Paratransit
- 7** No-Shows in ADA Paratransit

A Series of  
Topic Guides  
for Transit  
Agencies,  
Riders, and  
Advocates on  
the Americans  
with Disabilities  
Act (ADA) and  
Transportation

The series is available at <http://dredf.org/ADAtg>

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### INTRODUCTION

The Americans with Disabilities Act (ADA) requires transit agencies to announce stops on the bus and the train, as well as to identify bus and train routes at stops that serve more than one route. Stop and route identification announcements have great value for many riders with disabilities. The lack of an effective stop announcement and route identification program can be the factor that forces riders onto paratransit.<sup>3</sup> Nevertheless, it has been challenging for many transit agencies to fully implement these requirements.<sup>4</sup>

**The lack of effective stop announcements and route identification can force riders onto paratransit.**

This Topic Guide on Stop Announcements and Route Identification<sup>5</sup> first explains the ADA requirements. Then, stop announcement development and stop announcement lists are addressed, as well as technology for both stop announcements and route identification. After a discussion of what else riders and advocates need to know, including the rider's role in stop announcements and route identification, the Topic Guide examines transit agency operational practices for effective stop announcement and route identification programs in policies and training, monitoring and progressive discipline, and complaint investigation.

The Topic Guide Series on ADA Transportation is for transit agencies, public transit riders, and disability advocates. The Topic Guides bring together the requirements of the ADA and the U.S. Department of Transportation (DOT) ADA regulation, Federal Transit Administration (FTA) determinations, and best operational practices on each topic. The Federal Transit Administration enforces the ADA in the area of publicly funded transit. Readers who wish to understand the most authoritative and up-to-date interpretations of the ADA transportation requirements may wish to check both the text and endnotes of this Topic Guide to find specific FTA determinations on particular stop announcement and route identification issues.

The determinations FTA makes in its ADA compliance reviews indicate key transit agency requirements and responsibilities that are important for transit agencies to implement. In each ADA compliance review, FTA *Findings* are the basis for corrective actions by the transit agency. FTA *Recommendations* identify one possible way to address the Findings. Many of the reviewed agencies have implemented service improvements since the time of their reviews. The FTA ADA compliance reviews may be found in full at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html), or go to [www.fta.dot.gov/ada](http://www.fta.dot.gov/ada) and select FTA ADA Compliance / ADA Compliance Review Final Reports.

The Topic Guide series on ADA Transportation also draws information from many other sources, including DOT Disability Law Guidance; FTA ADA Letters of Finding and Bulletins; Transportation Research Board and National Council on Disability publications; National Transit Institute courses; Easter Seals Project ACTION publications and Distance Learning Sessions; American Public Transportation Association draft Recommended Practices; and the recommendations of nationally recognized ADA transit operators, planners, and researchers on the best operational practices for implementing ADA requirements.

More information on stop announcements and route identification can be found in the *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, which is published by Easter Seals Project ACTION and is available free of charge at

[https://secure2.convio.net/es/site/Ecommerce/1361714365?VIEW\\_PRODUCT=true&product\\_id=6721&store\\_id=9663](https://secure2.convio.net/es/site/Ecommerce/1361714365?VIEW_PRODUCT=true&product_id=6721&store_id=9663).

## STOP ANNOUNCEMENTS

On fixed route transit systems,<sup>6</sup> the ADA requires transit agencies to announce stops, at least, at:

- Transfer points with other fixed routes.
- Other major intersections and destination points.
- Intervals along a route sufficient to permit individuals who are blind or have vision impairments or other disabilities to be oriented to their location.
- Any requested stop.

These requirements apply to all forms of fixed route bus and passenger rail service, including Amtrak and light, rapid, and commuter rail.<sup>7</sup>

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**Stop announcements must be made regardless of whether the driver sees a passenger with a disability.**

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Though many transit agencies have increased stop announcement efforts, a great deal of misunderstanding remains about this ADA requirement. For example, it is not uncommon for vehicle operators such as bus drivers to call stops only when they can identify a passenger who is blind or has a vision impairment. However, such riders do not always have a cane or service

animal. People with other disabilities, such as cognitive disabilities, and people with hidden disabilities may also need stop announcements. Yet they may not be easily identified by the driver. The ADA stop announcement requirements apply regardless of whether or not a driver can identify a passenger with a disability. The same considerations apply to Route Identification.<sup>8</sup>

[Also see *Commitment to Stop Announcement and Route Identification Efforts*, p.7 below; *Developing Stop Announcements*, p. 7 below, *Stop Announcement Lists*, p. 10 below, and *Stop Announcement Technology*, p. 10 below.]

## ROUTE IDENTIFICATION

At stops that serve more than one route, the transit agency must provide a means by which an individual who is blind or has a vision impairment or other disability can identify the proper vehicle to enter, or be identified to the vehicle operator as a person seeking a ride on a particular route. Route identification assists riders who may not be able to recognize the bus route or destination to know when the desired bus has arrived. This requirement applies both to buses and to all forms of passenger rail.

Route identification is a poorly understood ADA requirement. Many transit agencies have focused more attention on on-board stop announcements, and missed the importance of route identification. Some have external route announcements in their formal policies, but in practice, many do not perform route identification with any level of consistency.<sup>9</sup>

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### The ADA requires external route announcements on vehicles.

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External announcements on vehicles is the approach to route identification required by the ADA. While there are other approaches, such as various devices to enable riders to identify themselves to vehicle operators as wanting to ride on a particular route, these have only limited usefulness. These devices should be viewed as supplements to a good external announcement policy and program. [Also see *Route Identification Practices and Technology* below, p. 13.]

Both the route and the destination should be announced, so the rider with a disability can determine whether he or she is going in the correct direction.

[Also see *Commitment to Stop Announcement and Route Identification Efforts*, p.7 below, and *Route Identification Practices and Technology*, p. 13 below.]

### COMMITMENT TO STOP ANNOUNCEMENT AND ROUTE IDENTIFICATION EFFORTS<sup>10</sup>

High-level management support is necessary for stop announcement and route identification efforts to be effective. Management support includes committing adequate resources and supporting a comprehensive training program, monitoring effort, and discipline/incentives program.

Support from any labor unions or other recognized employee associations is also a key to a successful program. A unified message to drivers from both management and labor is best.

Transit agencies are encouraged to convene a broad-based interdepartmental working group to develop and implement policies for stop announcements and route identification, including many different parts of the organization such as equipment procurement, maintenance, training, monitoring, public information, and marketing. This working group should meet as needed to develop, implement, and monitor stop announcement and route identification policies.

Rider involvement is also vital. Riders can provide valuable input on many issues including what stops to announce, how to announce them, employee training, and monitoring via secret rider programs. [Also see *Developing Stop Announcements*, p. 7 below, *Policies and Training*, p. 18 below, and *Monitoring and Progressive Discipline*, p. 19 below.]

### DEVELOPING STOP ANNOUNCEMENTS

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**It is a best practice to involve the disability community and bus drivers in selecting stops to announce.**

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In developing stop announcements, transit agencies should first determine what stops should be announced on each route. Some of the ADA requirements make it clear which stops to include, such as the requirement to announce transfer points with other fixed routes. Other requirements must be applied locally, such as determining major intersections and destination points. Destination points include, for example, shopping centers, hospitals, and the end points of the bus or train route.

It is a best practice for transit agencies to work with the disability community to define the stops to announce on each bus route. Bus drivers should also be consulted. Drivers understand how routes are structured, the distances between points on a route, and which

announcements their riders with disabilities request. Also, it is beneficial to encourage vehicle operator commitment to the stop announcement program through early involvement.

### ORIENTATION ANNOUNCEMENTS

In addition to the requirements for stop announcements at transfer points, major intersections, and other destination points, the ADA also requires the announcement of stops at intervals along a route sufficient to permit individuals who are blind or have vision impairments and other disabilities to be oriented to their location. If there is no major intersection, destination point, or transfer point where a stop announcement is otherwise required for a significant length of time—for example, for more than five minutes—then a stop announcement may be needed for orientation. The disability community should be involved in making these determinations.

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**Sometimes transit agencies neglect to include orientation announcements, or make too few.**

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Sometimes transit agencies implement the requirements for transfer points, major intersections, and destination points, yet neglect the requirement for orientation announcements.<sup>11</sup> It is also common to underestimate how often such orientation announcements should be made. The frequency of announcements for orientation purposes should be route and system-specific, and needs to be made on a case-by-case basis. More frequent announcements provide better orientation than less frequent ones. If there are long stretches of the route with no stops (for example, if a portion of the route is on a limited access roadway, such as a highway), announcements should be made at the last stop before entering, and the first stop after leaving, that stretch.

### CONSISTENCY IN STOP ANNOUNCEMENTS

It is a best practice for a transit agency to develop consistent ways of making stop announcements, so that the information is clear and is not misunderstood. For example:

- First, naming the street the bus is on, and second, naming the cross street, or vice versa.
- Giving the street name only (such as Market and Taylor) or including Street or Avenue (such as “Market Street at Taylor Avenue”).
- How to describe major landmarks, destinations, and transfer points.

Once these decisions are made, they should be implemented consistently throughout the transit system, on all transit modes such as bus, bus rapid transit, and rail. In bus fleets that include both buses with automated announcements and buses with driver announcements, there should be consistency between the driver and automated announcements.<sup>12</sup>

### OTHER PROCEDURES FOR MAKING STOP ANNOUNCEMENTS<sup>13</sup>

Transit agencies should develop procedures for how to make stop announcements, including:

- How far in advance of the stop to make the announcement. Announcements should be made in advance of the stop, but not too far in advance.
- How to handle rider requests [Also see *Stops Requested By Riders* below, p. 9].
- How to use the public address (PA) system.
- How to use any automated system that may be available.
- What to do in case the automated system malfunctions or fails.

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**Establish what to do when the automated stop announcer malfunctions.**

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These procedures should be part of the final detailed stop announcement policy that is distributed to employees and made a part of the training and retraining materials.

### STOPS REQUESTED BY RIDERS

Transit agencies need to consider how to facilitate the announcement of stops requested by riders. One transit agency approach was to print Stop Assistance Cards that riders may use.<sup>14</sup> Riders indicate on the card the stop they wish to have announced, and hand the card to the driver when they board. Since riders may make the same trip on future dates, the driver returns the card to the rider when he or she disembarks. The card can be a good reminder to the driver, and may be helpful to riders with hearing, speech, and other disabilities. For riders with speech disabilities, the card can facilitate communication. For riders with hearing disabilities, the driver's returning the card to the rider can ensure the rider knows the bus has arrived at the desired stop. Even if cards are used, transit agencies also need to develop procedures for drivers to make requested announcements for riders who do not have cards when they board. One way to do this would be to supply drivers with blank cards that they can

fill out when stop announcements are requested. If a card system is used, riders may still always request stop announcements without using a card.

### STOP ANNOUNCEMENT LISTS

Lists of stop announcements for each route should be prepared that indicate what stops should be announced and detail how each required stop announcement should be made.<sup>15</sup> The lists should be developed with disability community and driver input.

The lists should be readily available to vehicle operators. Drivers may not always be assigned to the same route, and will not have the required announcements and specific announcement protocol memorized for every route they might be asked to drive. This is particularly true for extraboard drivers.

One good transit agency practice is to provide laminated stop announcement sheets organized by route number in the driver lounge area. As needed, drivers can take the list that applies to their route on their shift and then return it at the end of the shift. Another approach is to include stop announcements on the “paddle” or “turn list” (the detailed directions for running the route) that each driver takes with him or her on each shift.

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**Detailed lists of stop announcements should go out with drivers each day.**

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Regardless of the specific method used, it is important for detailed announcement lists to go out with vehicle operators each day. In some transit agencies, the lists appear only in policies and training materials, yet it is expected that drivers will bring the correct list with them each day. This is probably insufficient to enable successful stop announcements.

Stop lists may need to be changed over time, and should be kept current.<sup>16</sup>

### STOP ANNOUNCEMENT TECHNOLOGY

Another key to successful stop announcements is the technology used to make them. Except on small vehicles (22 feet and under), a public address system is necessary for amplification of stop announcements and other passenger information. FTA ADA compliance reviews have found that a significant percentage of announcements made on larger buses without

amplification were not audible throughout the vehicle. Other problems with the audibility of announcements have been found on both buses and trains.<sup>17</sup>

A public address (PA) system should be easy to use. Transit agencies should investigate various types of PA systems and work with their vehicle operators to test and select the system that works best for them. Hands-free systems activated by a foot pedal have been well received by drivers in some transit agencies. Other options include lapel and sleeve microphone alternatives to the traditional gooseneck microphones.

### AUTOMATED ANNOUNCEMENT SYSTEMS

Many transit agencies utilize automated announcement systems. The U.S. Access Board Draft Revisions to the ADA Accessibility Guidelines for Buses and Vans, published November 19, 2008, proposed requiring automated stop announcement systems on all larger vehicles operated by public entities on fixed routes with multiple stops.<sup>18</sup> The cost is estimated at \$8,000 to \$10,000 per vehicle.<sup>19</sup> Technology is changing constantly. In addition to meeting with potential vendors, it is helpful to visit peer systems when considering automated stop announcement systems.<sup>20</sup>

**Automated systems help ensure announcements are made, but don't reduce the need for transit agency efforts.**

Automated systems can help ensure that announcements are made, and made consistently. Even with automated technology, it is very important for transit agencies to ensure that drivers are prepared to make voice announcements when the automated system is malfunctioning.<sup>21</sup> Thus, automated stop announcement technology is not a panacea that alleviates the need for drivers to make announcements. Moreover, since any requested stop must be announced, transit systems need to maintain driver readiness to make announcements at any time.

Though automated stop announcement systems have great value, they have also been subject to a variety of difficulties, including technology prone to breakdowns, drivers disabling the technology or using it improperly, the inability of transit agencies to have the system announce as many stops as desired, and problems with volume and timing. FTA has addressed some of these difficulties in ADA compliance reviews.<sup>22</sup> Transit agencies should not assume that obtaining automated stop calling technology will allow them to reduce their efforts to implement the ADA stop announcement requirements.

If a transit agency is using automated stop announcement technology, it must decide how much additional audio content to include. Some transit agencies have included a wide range of additional audio content, from safety announcements to holiday greetings. In general, unnecessary audio content, such as “Have a nice day” and holiday greetings, should not be made. Audio content that relates to accessibility features needed by passengers with disabilities, such as elevator outages, should be included, as should translations into alternate languages. If audio content that is unrelated to stop announcements is included, do so in a way that does not negatively impact the effectiveness of the ADA-required announcements. For example, all ADA stop announcements could be made in a recognizable voice, with no other announcements made in that voice. Or, all ADA stop announcements could be preceded by a recognizable tone, with no other content preceded by that tone.

Changes in stop lists and/or bus stop locations may require extensive and exacting positional information for automated stop announcement systems to function properly, necessitating field work, Geographic Information System (GIS) records maintenance, and incorporation of new route and stop information. Additional lead time to record the announcements may be necessary if off-site voice talent is utilized. All these activities should be considered in service change timelines.

### SOUND QUALITY

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**A single speaker does not always provide clear announcements.**

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Stop announcements need adequate sound quality. A single speaker does not always provide clear announcements throughout the vehicle. It is suggested that buses be equipped with multiple speakers, located appropriately throughout the bus. For example, some MBTA buses in Boston have six internal ceiling-mounted speakers to enhance audibility throughout the bus.<sup>23</sup>

It is recommended that transit agencies obtain advanced amplification technology that can sense ambient background noise and automatically adjust the volume.<sup>24</sup> In lower technology systems, take care not to locate speakers too close to the driver or to passengers that might blare into their ears.

### MAINTENANCE OF STOP ANNOUNCEMENT EQUIPMENT

Keeping the equipment for stop announcements in working order is vital. The PA and automated announcement systems should be included on pre-trip inspection forms, and

checked during pre-trip inspections. The checks should include the working condition of the PA system and a check to ensure the volume is at a proper level. The PA and automated announcement systems should also appear on preventive maintenance (PM) forms and should be inspected and tested regularly.<sup>25</sup> More detailed information on the ADA requirements for maintenance of accessibility features and equipment may be found in the Topic Guide on *Equipment Maintenance*, which is available at <http://dredf.org/ADAtg>.

### ROUTE IDENTIFICATION PRACTICES AND TECHNOLOGY

**Identify the route any time passengers are waiting at a stop serving more than one route.**

Conducting route identification properly requires an announcement any time passengers are waiting at a stop that serves more than one route. FTA observed in some ADA compliance reviews that drivers slowed as they approached stops with waiting passengers and looked for a signal from one of the passengers indicating that they wish to ride on that particular route.<sup>26</sup> This practice is not consistent with the ADA. It is also a poor practice because it assumes that riders can properly identify the correct vehicle. Policies should direct drivers always to stop if there are waiting passengers, regardless of whether or not they signal for the bus. Vehicle operators should come to a complete stop, open the door, and make a route announcement unless it is automatic.

### AUTOMATED ROUTE IDENTIFICATION SYSTEMS

Transit agencies should purchase vehicles with external route identification announcement systems. The U.S. Access Board Draft Revisions to the ADA Accessibility Guidelines for Buses and Vans, published November 19, 2008, proposed requiring automated route announcement systems on all larger vehicles operated by public entities on fixed routes with multiple stops.<sup>27</sup>

External route announcement systems can be driver-activated or automated. Some transit agencies have systems that make announcements each time the door is opened. Some are programmed to make repeating (also termed "looping") announcements at set intervals so that passengers who may not be close to the door when the initial announcement is made can hear the repeated announcement.<sup>28</sup>

As with automated stop announcements, automated route identification technology is changing constantly. In addition to meeting with potential vendors, it is helpful to visit peer systems when considering automated route announcement systems.<sup>29</sup>

### ROUTE IDENTIFICATION BY VEHICLE OPERATORS

If automated external announcement technology is not used, drivers should call out route information after pulling up to stops and opening the door, if there are any waiting passengers. The announcement should be loud enough for waiting passengers to hear. An external PA speaker is helpful to ensure that announcements are audible.

At transit centers, drivers should exit the bus and announce the route information to waiting passengers. This should be done when the bus first arrives, before it departs, and at other times in between if the bus has a long layover at the center.

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**Drivers must always be ready to make route announcements if equipment fails.**

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Even with automated external announcement systems, drivers must always be trained and ready to make operator announcements in the event of an equipment failure.

### OTHER KINDS OF ROUTE IDENTIFICATION TECHNOLOGY

New technologies are emerging for route identification. While potentially beneficial, they should be considered supplemental to a good external route announcement policy and program.

Some stops are situated in a way that makes it difficult for drivers to see if there are waiting passengers, particularly at night. Innovative technology can provide a best practice for this situation. Pace in suburban Chicago has installed user-activated signals at such stops. Riders can activate a flashing LED light to let drivers know they are waiting at the stop. The signal system also enables waiting riders to activate general lighting in the stop area. The Pace signal systems are solar powered.<sup>30</sup>

Vehicle-activated signaling and signage is an upcoming technology in which signaling devices are mounted on vehicles that activate signage at stops. Each bus emits a signal that identifies its route and destination. The signal could activate both visual and auditory signage at stops.

Another way to perform route identification at transit centers is via in-station platform announcements to direct waiting riders to the correct location for vehicles serving specific routes. Such efforts should be considered additions to the required route identification announcements.

### MAINTENANCE OF ROUTE IDENTIFICATION EQUIPMENT

As with stop announcement equipment, external PA or automated route announcement technologies need to be maintained. Many of the practices recommended for stop announcement technology are recommended for route identification technology as well, such as including the devices on pre-trip and preventive maintenance checklists and exploring advanced technology to adjust the volume for ambient background noise. [Also see *Maintenance of Stop Announcement Equipment* above, p. 12.]

Another consideration for external route identification systems is the location of external speakers. They are subject to accelerated deterioration from exposure to weather, if mounted externally, but they can be located to minimize exposure.<sup>31</sup>

## WHAT ELSE RIDERS AND ADVOCATES NEED TO KNOW

### THE RIDER'S ROLE

Riders can promote an effective stop announcement and route identification program.

- Wait in the immediate area of the bus stop. Wait in the immediate area of the bus stop, so that drivers will know to be sure to stop, and so that announcements will be easier to hear.
- Get involved. Participate with the transit agency to develop stop lists and announcement procedures.
- Inform the transit agency. If stops are not called or automated announcement technology malfunctions:
  - > Inform the bus driver.
  - > Record the bus number, date, time, route, location, and what the problem is.
  - > Inform the transit agency, using the transit agency customer comment process.

Riders, advocates, and transit agencies should all work to ensure that the best practices in stop announcements and route identification (many of which are described in this Topic Guide) are implemented. Riders are an important source of information about service quality and can help

transit agencies with service monitoring efforts. And as the National Council on Disability showed, disability advocates can play an important role in improving the performance of their transit agencies.<sup>32</sup>

### ENFORCEMENT OF YOUR ADA RIGHTS

If you think your transit agency is not in compliance with the ADA, there are several avenues available for enforcement. You may pursue them in any order; you are not required to use them in the order listed below.

#### ***1. File a local complaint***

You can file a complaint with your local transit agency and/or otherwise communicate with local agency staff. Transit agencies are required to have procedures to receive, resolve, maintain records of, and report on complaints.<sup>33</sup> It is best to file the complaint quickly, as soon as possible after the problem, and keep a copy of it. Include as many details as possible (who, what, when, where, and so on). Find the transit agency Customer Service department or ADA Coordinator to learn how to submit the complaint. Transit agencies usually have one or more of the following options for filing complaints: by e-mail, through their websites, by telephone, and/or by postal mail. If the issue remains unresolved after allowing a reasonable amount of time for a response, you can file a complaint with the Federal Transit Administration in Washington D.C. and show your local complaint records [also see *File an ADA complaint in Washington D.C.* below, p. 17].

#### ***2. Engage in local advocacy***

You can also engage in a variety of efforts to advocate for changes by your local transit agency.

You may be able to obtain assistance from local, state, and national disability rights organizations, including:

- Your state's Protection and Advocacy Agency, which you can find by going to <http://ndrn.org/> and scrolling down to the "Get help in your state" section, or by calling 202/408-9514 (or by TTY, 202/408-9521).
- Your local center for independent living (CIL), which you can find by going to [www.ilru.org/html/publications/directory/index.html](http://www.ilru.org/html/publications/directory/index.html) or calling 713/520-0232 (Voice/TTY). You can also find CILs by going to [www.ncil.org/directory.html](http://www.ncil.org/directory.html).

In some cities, the disability community and the transit agency have succeeded in building a collaborative relationship in which they work together to improve transit service for people with disabilities.

### ***3. File an ADA complaint in Washington, D.C.***

You can file a complaint with the Office of Civil Rights of the Federal Transit Administration (FTA) in Washington, D.C., by:

- Filling out and sending the Rider Complaint Form at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3889.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3889.html)
- Going to the FTA ADA website at [www.fta.dot.gov/ada](http://www.fta.dot.gov/ada) and selecting ADA Technical Assistance / File an ADA Complaint with the FTA
- Sending a complete letter to:

Director  
FTA Office of Civil Rights  
East Building – 5th Floor, TCR  
1200 New Jersey Ave. SE  
Washington, D.C. 20590

Include as many details as possible (who, what, when, where, and so forth), including a record of ongoing ADA violations you believe have occurred. As the FTA Office of Civil Rights states on the Rider Complaint Form:

You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.<sup>34</sup>

### ***4. File a lawsuit***

The other method of enforcing the ADA is to file a lawsuit.

### **OTHER RESOURCES**

You will find many other resources on the FTA ADA website at [www.fta.dot.gov/ada](http://www.fta.dot.gov/ada). You may also contact the FTA Office of Civil Rights by e-mail at [FTA.ADAAssistance@dot.gov](mailto:FTA.ADAAssistance@dot.gov) or by telephone at 202/366-4018 or 888/446-4511 (or by TTY, 800/877-8339).

In addition to providing technical assistance via telephone and e-mail, the FTA Office of Civil Rights conducts ADA compliance reviews of several transit agencies every year. These reviews are posted on the FTA ADA website at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Additional resources may be available from a variety of local, state, and national disability rights organizations.

### WHAT ELSE TRANSIT AGENCIES NEED TO KNOW

#### POLICIES AND TRAINING

Transit agencies should have detailed, written policies and procedures that address each of the ADA stop announcement and route identification requirements. Some transit systems do not have comprehensive policies for every regulatory requirement.<sup>35</sup> A lack of written policies can contribute to inconsistent compliance. The policies should be covered thoroughly in employee training.

In addition to conveying ADA requirements and policies, training should stress the importance of making announcements. Vehicle operators are not always aware that announcements are necessary for accessibility and that a lack of announcements can be a serious safety problem for riders with disabilities. For example, disembarking at the wrong stop can be a major obstacle for a person who is blind or has a vision impairment or cognitive disability, and who has been trained to travel to and from specific stops. Also, a failure to make stop and route announcements leads to increased reliance on paratransit, which may negatively impact both passengers and the transit agency.

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**If new drivers train with experienced drivers, select driver trainers who excel in stop announcements.**

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Another issue to cover in training is that bus drivers sometimes think they needn't make stop announcements if they do not notice any riders with disabilities on the bus, or if they know all the riders and believe the riders do not need announcements. However, this is a misunderstanding of the ADA requirement. Stop announcements are important for many riders with hidden disabilities, and they are helpful to other riders as well. They should be made for any and all riders, as a feature of universal design.

Riders with disabilities should be involved in training. They can put a human face to the importance of stop announcements and can stress the serious safety issues involved.

Transit agencies should also train drivers to respond to riders who might complain about the presence of stop announcements. In addition, a best practice is to place public information cards on buses explaining the purpose and need for stop announcements.

Many training programs include a period of time when trainees ride with and learn from experienced driver-trainers. Transit agencies should be sure that the experienced drivers assigned to any new vehicle operators are drivers who are performing their stop announcements correctly. Teaming trainees with drivers who do not make stop

announcements correctly or who are not committed to following established policies and procedures can undermine prior training. Driver trainers should have a documented track record of exemplary performance of stop announcements.

### **MONITORING, PROGRESSIVE DISCIPLINE, AND INCENTIVES**

Proactive monitoring and progressive discipline programs are vital to the successful implementation of both on-board stop announcement and route identification policies.<sup>36</sup>

On-board security camera systems are one monitoring aid. Transit agencies that record on-board activity continuously (as opposed to event-activated camera systems) can make both audio and video recordings, which can then be monitored to verify that stop and route announcements are being made correctly. This may need to be negotiated with any driver labor unions or other recognized employee associations.

Both internal monitors and road supervisors can conduct monitoring. If a transit agency utilizes employees for monitoring, it should select monitors that drivers will not recognize. For example, large transit agencies can utilize supervisors from one garage to monitor an area where they do not regularly work. Or managers and office staff, less easily recognized by drivers, can monitor while they commute to and from work. Smaller transit agencies may find it more difficult to use in-house employees effectively. Transit agencies of any size should also consider secret rider programs that utilize regular riders in order to conduct effective monitoring. Riders can be trained to make and report their observations.

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**Monitoring should be combined with progressive discipline.**

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Transit agencies in Washington State have an innovative monitoring program. Developed by the Washington State Transit Insurance Pool (WSTIP), the Guest Rider Program is a best practice in monitoring. In return for a transit agency agreement to have its own seasoned, high-performing road supervisors and vehicle operators make observations in other transit systems, the transit agency receives the same benefit from another agency. Participating members are observed twice per year. Guest riders are trained to blend in with the ridership and accurately report their observations of individual vehicle operator performance and the entire transit system. Stop announcements and other aspects of ADA compliance are among the many areas of driver skills and vehicle functions observed by guest riders. For more information, contact WSTIP Member Services Manager at (360) 586-1800, extension 213.

Monitoring should be combined with progressive discipline. Discipline policies need to be negotiated with labor unions or other recognized employee associations, and clearly

communicated to drivers. The level of discipline needs to be on par with other safety violations, since it can be a safety risk if a rider with a cognitive disability, or who is blind or has a vision impairment, disembarks at a wrong stop. Intentionally disabling the automated announcement or PA system equipment (except in cases of malfunction) should be elevated to the highest level of discipline.

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### **Utilize recognition and other incentives when drivers achieve good performance.**

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Recognition and other incentives should also be considered when drivers achieve good performance. Programs such as employee of the month, pins and badges, public recognition, and financial incentives can be a useful component of an effective stop announcement program.<sup>37</sup>

## **ENLISTING THE AID OF THE COMMUNITY**

Some transit agencies have posted notices in all buses stating the ADA requirements to announce stops and routes, and providing contact information for reporting problems with stop and route announcements. This is a low-cost best practice that can engage the community in assisting the transit agency to improve its stop announcement and route identification program. It can also reduce complaints from riders who are bothered by constant announcements because they don't understand their purpose.

## **COMPLAINT INVESTIGATION**

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### **Thorough complaint investigation is an important part of ADA compliance.**

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The thorough investigation of all complaints related to the use of fixed route accessible service is an important part of monitoring and compliance. Transit agencies should ensure that all rider complaints are recorded and investigated. Transit agencies are required to have procedures to receive, resolve, maintain records of, and report on complaints.<sup>38</sup>

Transit agencies should provide timely responses to riders with information about the outcome of investigations. Transit systems should then use information obtained from investigations to

address any performance issues and improve service, as an integral part of their ADA compliance effort.

## GENERAL RESOURCES FROM FTA

Many ADA resources are available on the website of the Office of Civil Rights of the Federal Transit Administration at [www.fta.dot.gov/ada](http://www.fta.dot.gov/ada). The FTA Office of Civil Rights may be contacted by e-mail at [FTA.ADAAssistance@dot.gov](mailto:FTA.ADAAssistance@dot.gov) or by telephone at 202/366-4018 or 888/446-4511 (or by TTY, 800/877-8339).

### ENDNOTES

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- 1 The authors of the Topic Guide Series on ADA Transportation are Marilyn Golden, Policy Analyst, Disability Rights Education & Defense Fund (DREDF) and Russell Thatcher, Senior Transportation Planner, TranSystems Corporation.

We wish to acknowledge our Advisory Committee and the additional people who reviewed the Topic Guide series. The Advisory Committee includes Linda Deavens, Director, Paratransit, Inc., Sacramento, California; Susan Gallagher, Manager of Accessible Services, San Francisco Bay Area Rapid Transit District, Oakland, California; Bonnie Hitch, Customer Service Manager, DART First State/Delaware Transit Corporation, Dover, Delaware; Kevin Irvine, formerly Senior Advocate, Equip for Equality, Chicago, Illinois; Toby Olson, Executive Secretary, Washington State Governor's Committee on Disability Issues and Employment, Olympia, Washington; and Nancy Pineles, Managing Attorney, Maryland Disability Law Center, Baltimore, Maryland.

The Topic Guide series was also reviewed, in whole or in part, by Doug Douglas, Vice President, Paratransit Services and Tammy Haenftling, Assistant Vice President, Paratransit Management Services, Dallas Area Rapid Transit (DART), Dallas, Texas; Karen Hoesch, Executive Director, Access Transportation System, Pittsburgh, Pennsylvania; Richard Weiner, Principal, Nelson\Nygaard Consulting Associates, San Francisco, California; and Stacy Zwagers, Program Manager, Access to Independence, San Diego, California.

The authors also extend appreciation to DREDF staff Ann McDonald-Cacho, Dave Nold, Julia Epstein, Linda D. Kilb, and Katie Keil.

- 2 This report was funded through a cooperative agreement between the Disability Rights Education & Defense Fund (DREDF) and the Federal Transit Administration (FTA), U.S. Department of Transportation. The views and policies expressed herein do not necessarily represent the views or policies of the Federal Transit Administration. The United States government assumes no liability for the contents or use of this report.
- 3 A Letter of Finding from the Federal Transit Administration Office of Civil Rights stated in 2003, "Where the failure to call stops is a systemic problem with low rates of calling out stops, and the person with the disability cannot use the system, the transit system must make that rider ADA Complementary Paratransit eligible. This is so until such time as the problem is remedied and the system becomes accessible."

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Letter of Finding by Cheryl L. Hershey, then ADA Group Leader, Office of Civil Rights, Federal Transit Administration, October 14, 2003, regarding FTA Complaint No. 99218 against Maryland Transit Administration, p. 3.

- 4 Many FTA ADA compliance reviews, including these six, found a variety of difficulties with implementation of the ADA stop announcement requirements on both bus and rail vehicles.

Finding: "Of the 45 bus trips observed all of the scheduled stops were announced on 3 trips (7%), some of the stops were announced on 37 trips (82%) and no stops were announced on 5 trips (11%). Overall bus drivers announced 50 % of the stops from the stop lists."

Recommendation: "It is recommended that the importance of stop announcements for individuals with visual impairments or other disabilities, as well as people without disabilities, as an aid to using the transit system, be clearly emphasized to bus and LRV operators by both trainers and transportation supervisors."

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *Assessment of Stop Announcement and Route Identification Efforts, Summary of Observations*, conducted June 12 – 15, 2000, Final Report dated May 25, 2001, pp. 13 – 14, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "Of 58 observations of route segments, no stop announcements were made on 11 (19 percent) of the routes."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *Summary of Observations, Review of Route Identification and Stop Announcements*, conducted January 16 – 19, 2007, Final Report dated July 30, 2007, p. 29, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "For MTA-operated bus service some announcements were made on 7 of the 34 trips observed. The assessment team observed MTA bus operators announcing 13% of the stops included in the MTA stop list. No stops were announced on 2 MTA contracted private contractor commuter bus trips. The team also observed stop announcements of 81%, 75%, and 91% respectively for LRT, rapid rail, and commuter rail services."

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Recommendation: "It is recommended that MTA revise its policy regarding stop announcements to include announcement of stops at sufficient intervals along the route to orient passengers, as required by 49 CFR 37.167 (b), and expand its written policies to apply to all fixed route, rail and contracted private carrier bus services, in addition to MTA operated bus service. The revised policy should emphasize that stop announcements are required for compliance with the ADA."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *Assessment of Stop Announcement and Route Identification Efforts, Summary of Observations*, conducted October 2 – 5, 2000, Final Report dated February 1, 2001, pp. 13 and 15, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "Drivers announced 109 (27 %) of 402 listed bus stops observed by the assessment team."

Finding: "On the 55 bus trips observed, 8 drivers (15%) announced all of the stops from PAT's stop announcement list. Of those drivers who announced all of the stops 4 announced far more stops than those on PAT's stop list. A total of 10 drivers (18%) announced more than 80% of the stops, 25 drivers (45%) announced at least one stop and 30 drivers (55 %) announced no stops at all."

Recommendation: "It is recommended that PAT clarify its procedures to implement the stop calling policy to specifically require calling out all stops on the stop list. Stop lists should be available on a continual basis at each garage where the driver checks out to begin the run in addition to being distributed to drivers upon picking new work schedules."

Recommendation: "It is recommended that PAT implement a central reporting and monitoring system for tracking driver compliance to ADA stop announcement requirements (as opposed to the existing system of separate tracking at each garage)."

Recommendation: "PAT should consider more aggressive remediation of drivers who fail to make stop announcements. Otherwise, failure to make announcements may be considered an acceptable practice by many drivers. Likewise, PAT should continue to commend drivers that make stop announcements in compliance with PAT policy."

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Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *Assessment of Fixed Route Stop Announcement and Route Identification Efforts, Summary of Observations*, conducted August 21 – 24, 2000, Final Report dated February 6, 2001, pp. 13 and 15 – 16, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "The assessment team observed that, overall, 61% of stop announcements were being made. Of that total, 29% of bus stop announcements were made; 63% of LRT Green Line and Mattapan Trolley announcements were made; 90% of Rapid Transit Blue, Orange, and Red Line announcements were made; and 77% of commuter rail announcements were being made."

Finding: "According to the MBTA Bus Stop Announcement Program 38% of bus and 75% of Green Line stops are currently announced (April 2000 quarterly report)."

Recommendation: "The MBTA should review and update the stop announcement lists to include all major intersections, transfer points, major destinations, and at sufficient intervals to orient passengers. Attention should be paid to making these announcement lists consistent among routes covering the same area and the lists are free of errors. This review should include input from the Advisory Committee."

Recommendation: "The MBTA should continue its Stop Announcement Monitoring Program and related training."

Federal Transit Administration ADA Compliance Review of Massachusetts Bay Transportation Authority (MBTA), Boston, Massachusetts, *Summary of Observations, Assessment of Stop Announcement and Route Identification Efforts & Assessment of Lift Reliability and Maintenance*, conducted July 2000, Final Report dated April 20, 2001, pp. I-1-20 and I-1-21, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "Overall, the assessment team found that 74% of the operators observed made at least some stop announcements; 55% of the vehicle operators made 'all' stop announcements; 9% made 'most' stop announcements; 10% made 'some' stop announcements; and 26% made 'none.'"

Recommendation: "It is recommended that installation of the automated stop announcement systems on fixed route buses be continued."

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Recommendation: "For those buses that do not have the automated system, the PAs should be repaired and/or replaced so that drivers can use them to make stop announcements."

Recommendation: "It is recommended that SEPTA's procedures be revised to require bus drivers to announce all stops on the lists being developed for the automated system when operating buses that do not yet have the automated system. This will improve uniformity of stop announcement practices and eliminate the inconsistencies among drivers. SEPTA should consider eliminating its megaphone program, which appears to be confusing to drivers and passengers."

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *Summary of Observations, Assessment of Stop Announcement and Route Identification Efforts & Assessment of Lift Reliability and Maintenance*, conducted August 20 – 24, 2001, Final Report dated April 18, 2002, pp. 26 and 27, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

- 5 This Topic Guide discusses the transportation provisions of the Americans with Disabilities Act Department of Transportation (DOT) regulation at 49 C.F.R. §§ 37.167(b) and (c), and 49 C.F.R. Part 37, App. D, § 37.167, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).
- 6 Fixed route transit systems are those that operate along prescribed routes according to fixed schedules, in contrast to demand response transit service, in which a vehicle is dispatched or routed in response to a potential rider's request. For example, the subway train is a fixed route system; taxis are a demand response service.
- 7 Several FTA ADA compliance reviews, including these three, addressed stop announcement deficiencies on the train.

Finding: "Out of LIRR's passenger fleet of 1,140 coaches, 73 percent have an automated station information system (ASI) that uses global positioning system technology. Another 12 percent of the coaches have ASI that uses transponders installed in the right-of-way. The remaining 15 percent have PA systems but no ASI."

Finding: On cars equipped with the ASI system, team members observed that station announcements were made by the ASI system 93 percent of the time. For

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the 14 observations in which cars had an ASI system, but the system was not working, crews made announcements 11 of the 14 times. Combining these two sets of observations yields an audible station announcement performance rate of 98 percent on cars equipped with ASI."

Finding: "On cars without ASI, the review team observed audible announcements 62 percent of the time. This rate of announcements by train crews on cars without ASI is deficient in identifying stations for people who are blind, have low vision, or many other types of disabilities."

Finding: "As noted in Section 3 of this report, conductors are not responsible for testing the PA system at the start of a trip. Rather, car repairmen are responsible for daily inspection of PA systems. As a result, conductors indicated that they do not consistently check the operation of the PA system on each car. Consequently, conductors may not know if the PA is functioning."

Recommendation: "LIRR should increase the frequency of its covert monitoring of on-board station announcements. It should also consider implementing a 'secret shopper' monitoring program of paid or volunteer riders."

Recommendation: "LIRR should continue to inspect ASI systems daily and identify and repair the ASI systems expeditiously."

Recommendation: "LIRR should increase its efforts to train crews to announce all stations when an operational ASI system is not available. LIRR should increase its efforts to monitor train crew performance in making station announcements and take appropriate remedial or disciplinary action to improve the performance of the train crews."

Recommendation: "LIRR should have train crews test the PA systems before beginning their daily runs rather than rely on car repairmen. Problems should be immediately reported to the Communications Network Operations Center."

Recommendation: "Conductor training should reinforce the importance of making station announcements and provide a specific procedure for making voice announcements when the ASI system is unavailable or inoperable."

Federal Transit Administration ADA Compliance Review of Long Island Rail Road (LIRR), Jamaica, New York, *Review of Route Identification and Station*

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*Announcements, Summary of Observations*, conducted July 16 – 19, 2007, Final Report dated October 17, 2008, pp. 26 and 31 – 32, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "Rapid transit and subway station announcements appear to be made on the Orange, Red, and Blue lines, when the PA systems are operational. However, there was only 1 external announcement observed for the Green Line, which has up to four routes sharing the same track on most of the subway portion of that line."

Recommendation: "The MTBA should re-train personnel with respect to the requirement for route/vehicle identification."

Federal Transit Administration ADA Compliance Review of Massachusetts Bay Transportation Authority (MBTA), Boston, Massachusetts, *op. cit.*, p. I-1-26.

Finding: "Broad Street Subway operators did not differentiate between southbound trains headed toward Pattison versus the Broad Street Spur."

Recommendation: "It is recommended that external announcements be required at all stops on those segments of the Broad Street Subway and Subway-Surface lines where trains serve more than one route."

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *op. cit.*, p. 31.

- 8 In these three FTA ADA compliance reviews, vehicle operators believed that the ADA stop announcement and/or route identification requirements applied only when they could identify a rider who is blind or has a vision impairment.

Finding: "Most drivers interviewed appeared to be aware of a requirement to call out stops. However, many understood this requirement to apply only when a passenger appears to be blind or disabled. Several drivers did not know that stop cards existed."

Finding: "Drivers interviewed do not appear to understand the requirements for external stop announcements. Many drivers indicated that they only make external route announcements if the passenger 'looks' blind."

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Recommendation: "It is recommended that PAT's training program, including supplemental ADA training, emphasize the need for drivers to identify routes to **all** waiting passengers at stops shared by more than one route. The training program should identify the reasons for this requirement noting that some individuals with visual impairments or other disabilities, such as developmental disabilities, will not be recognizable to the driver. PAT should also provide training to driver supervisors and QAO monitors."

Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, pp. 13 and 19 – 20.

Finding: "Of twelve operators interviewed many were unaware of any requirement for route identification and the remainder understood the requirement to be limited to making external route announcements only when they identified a passenger who was blind."

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, p. 18.

Finding: "Many operators appear to be cognizant of the need to identify the route to someone who appears to be blind. This practice can result in operators not identifying routes to many individuals with visual impairments or other disabilities, who do not appear to be blind, such as individuals with cognitive disabilities. In general, operators interviewed appeared to be unaware of the ADA requirements to identify routes."

Recommendation: "It is recommended that MTA's training program instruct LRT operators and bus drivers to identify routes to **all** waiting passengers at stops shared by more than one route."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, p. 20.

- 9 In many ADA compliance reviews, including these eight, FTA found that transit agencies have not consistently implemented the route identification requirement.

Finding: "KCATA does not require operators to identify their route to customers waiting at stops shared by more than one route. In Subsection D of the Disability

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Awareness Section of its *Metro Operator Training Manual and Resource Guide*, KCATA requests operators to announce, outside their bus, their route number at transfer points and bus stops serviced by other routes.”

Finding: “Of 12 operators interviewed, none understood the requirement to make route announcements at stops shared by more than one route so that people who are blind, have low vision, or cognitive disabilities which prevent them from identifying the bus can identify the route.”

Finding: “The review team observed only one route announcement in 68 observations.”

Recommendation: “KCATA must require operators to identify their route to customers waiting at stops shared by more than one route. Procedures should be revised accordingly.”

Recommendation: “KCATA should revise its operator training to ensure that operators understand the requirement to make route announcements at any stop shared by more than one route.”

Recommendation: “KCATA should implement the automated route announcement component of its automated announcer system as expeditiously as possible.”

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 18 – 19 and 33 – 34.

Finding: “No external stop announcements were made at ten bus stops shared by multiple routes for any of the 78 buses observed. The bus route was not identified to waiting passengers at 121 stops shared by other routes while riding on 17 bus trips.”

Finding: “No external announcements and one internal announcement were made at 49-shared stops on 6 observed trips on the LRT System. It appears that MTA’s practice is to announce trip destinations to passengers on the vehicle at the last outbound stop shared by the two LRT Routes. This practice requires individuals with a visual impairment or other disability to transfer from one train to another during their trip.”

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Finding: "Many operators appear to be cognizant of the need to identify the route to someone who appears to be blind. This practice can result in operators not identifying routes to many individuals with visual impairments or other disabilities, who do not appear to be blind, such as individuals with cognitive disabilities. In general, operators interviewed appeared to be unaware of the ADA requirements to identify routes."

Finding: "Route identification by operators does not appear to be monitored by MTA."

Recommendation: "It is recommended that all management and supervisory personnel and operators be briefed and trained in the ADA requirements to identify routes."

Recommendation: "It is recommended that MTA's training program instruct LRT operators and bus drivers to identify routes to **all** waiting passengers at stops shared by more than one route."

Recommendation: "It is recommended that MTA establish a regular, consistent program to monitor route identification to permit accurate identification of performance and to support remedial action for violations. MTA may want to consider hiring temporary personnel to prevent easy identification of monitors by operators. It is recommended that monitoring be sufficient to review each operator at least once per year."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 20 and 21.

Finding: "Bus operators did not appear to be making external stop announcements at the time of the on-site assessment. Of the 110 situations where an external announcement should have been made, only 9 were observed."

Recommendation: "Training materials and policy manuals should be modified to more clearly describe the requirements for external identification. Specifically, the practice of identifying the route and destination at transfer locations should not be limited to times when someone has a white cane or guide dog. Many disabilities, including visual impairments, are not always apparent."

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Recommendation: "The MBTA should re-train personnel with respect to the requirement for route/vehicle identification."

Recommendation: "Monitoring external announcements should be incorporated into the Bus Announcement Monitoring Program."

Federal Transit Administration ADA Compliance Review of Massachusetts Bay Transportation Authority (MBTA), Boston, Massachusetts, *op. cit.*, p. I-1-26.

Finding: "Of twelve operators interviewed many were unaware of any requirement for route identification and the remainder understood the requirement to be limited to making external route announcements only when they identified a passenger who was blind."

Finding: "Riders with visual impairments report a wide variance in the extent to which routes are identified, possibly because of reliance on driver's judgement to recognize people with visual impairments."

Finding: "Operators did not appear to be making external stop announcements at the time of the on-site assessment. In 70 situations where an external announcement should have been made, none were observed."

Recommendation: "It is recommended that RT revise its Operators manual and District Guide to clearly describe its procedures regarding route identification. The policy should clearly identify procedures that provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter, or be identified to the vehicle operator as a person seeking a ride on a particular route, where vehicles for more than one route serve the same stop."

Recommendation: "It is recommended that RT revise its training program for operators to instruct drivers in procedures for route identification."

Recommendation: "It is recommended that RT's monitoring procedures be revised to include observations of external route identification and that a remedial procedure for failure to make external route announcements be established."

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, pp. 18 – 19.

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Finding: "The assessment team found that 23% of the 179 drivers observed at 12 different times made route/vehicle identification announcements. Of those, 57% were automated bus announcements."

Recommendation: "It is recommended that training materials and policy manuals be modified to more clearly describe the requirements for external route identification. Specifically, the practice of identifying the route and destination at transfer locations should not be limited to times when a waiting passenger has a white cane or guide dog. Many persons with disabilities, including those with developmental disabilities and some visual impairments, are not always apparent."

Recommendation: "It is recommended that monitoring external announcements be incorporated into the Quality Control Monitoring Program."

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *op. cit.*, p. 31.

Finding: "Operators did not appear to be making external stop announcements at the time of the on-site assessment. In 44 situations where an external announcement should have been made, none were observed."

Recommendation: "An external announcement/bus identification policy should be added to CATA's Work Rules and training materials."

Recommendation: "A renewed effort to inform operators of this policy and then to monitor operator performance should be undertaken by CATA."

Federal Transit Administration ADA Compliance Review of Capital Area Transportation Authority (CATA), Lansing, Michigan, *Assessment of Stop Announcement and Route Identification Efforts, Summary of Observations*, conducted April 3 – 5, 2000, Final Report dated November 21, 2000, p. 15, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

Finding: "PAT's procedures, as expressed in the 'Americans with Disabilities Act, Educational Manual and Reference Guide,' appear to instruct drivers to announce route number and destination only to passengers who have visual impairments or appear to need assistance. In instances where individuals with visual impairments or other disability are not recognized as such by the driver, and the driver fails to

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identify the route, the individual may be unable to identify the correct vehicle to enter. PAT's procedures could result in failure to identify routes to individuals with visual impairments or other disabilities."

Finding: "Supervisors appear to be unclear as to the requirement to identify routes to customers waiting at bus stops that are served by multiple routes. In at least one garage, drivers are not instructed to make external announcements."

Finding: "Drivers interviewed do not appear to understand the requirements for external stop announcements. Many drivers indicated that they only make external route announcements if the passenger 'looks' blind."

Recommendation: "It is recommended that PAT consider revising its policy regarding route identification to require drivers to announce route number and destination to waiting passengers at all stops shared by more than one route. Such an approach would assure that all passengers with disabilities are able to identify the proper vehicle to enter."

Recommendation: "It is recommended that PAT's training program, including supplemental ADA training, emphasize the need for drivers to identify routes to **all** waiting passengers at stops shared by more than one route. The training program should identify the reasons for this requirement noting that some individuals with visual impairments or other disabilities, such as developmental disabilities, will not be recognizable to the driver. PAT should also provide training to driver supervisors and QAO monitors."

Recommendation: "Upon completion of training/retraining of all drivers in revised route identification requirements it is recommended that monitors carefully record driver performance on QAO reports and that the information be entered into a central monitoring database."

Recommendation: "It is recommended that PAT address failure of drivers to identify routes to waiting passengers at stops shared by multiple routes with retraining and/or progressive driver discipline as appropriate."

Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, pp. 19 and 20.

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Finding: "The assessment team found that while some drivers were making route identification announcements during the boarding process, there were no external route identifications made to waiting passengers at stops served by more than one route, as required by the US DOT ADA Regulations."

Recommendation: "It is recommended that Pace require external announcements identifying the route be made by all drivers at all stops served by more than one route."

Recommendation: "It is recommended that Pace retrain personnel with respect to the requirement for route/vehicle identification. The list being developed for use with the new IBS automated announcement system should be used to train drivers."

Federal Transit Administration ADA Compliance Review of Pace Suburban Bus Division of the Regional Transportation Authority (PACE), Arlington Heights, Illinois, *Summary of Observations, Assessment of Stop Announcement and Route Identification Efforts & Assessment of Lift Reliability and Maintenance*, conducted July 22 – 25, 2002, Final Report dated March 4, 2003, pp. 20 – 21, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

- 10 Some of the issues discussed in this section are summarized from Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, Washington D.C., June 2009, p. 9.
- 11 In several ADA compliance reviews, including these three, FTA found that transit agency stop announcement policies did not adequately address the requirement for stop announcements to be made at intervals along the route sufficient to permit people with disabilities to be oriented to their location. At times, other required categories of stop announcements were also not implemented properly.

Finding: "The average (mean) interval between announcements exceeded five minutes on 16 (28 percent) of the route segments observed by the review team, and the average interval between announcements was between three and five minutes on 13 (22 percent) of the route segments."

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Finding: "For the 44 route segments observed with automated announcements, the average interval between stop announcements exceeded three minutes on 26 (59 percent) of the route segments."

Finding: "The interval between stop announcements exceeded three minutes on all of the routes relying upon operators to make voice announcements. Of the 14 routes with inoperable automated stop announcement systems, operators made voice announcements on only three (21 percent)."

Finding: "The stop lists used by KCATA do not appear to adequately address DOT regulatory requirements to announce stops at transfers to other routes and to announce stops sufficiently to orientate passengers. A comparison of KCATA's automated and operator stop lists to lists developed by review team for eight sample routes indicates that many stops where multiple routes converge, diverge, or cross and stops at turns on routes, are not included on KCATA's lists."

Finding: "In Subsection D of the Disability Awareness Section of its *Metro Operator Training Manual and Resource Guide*, KCATA requires its operators to announce transfer points and destination points on fixed routes. Operators are required to 'announce stops upon the request of a person with a disability'. The ADA requires that stops be announced sufficiently to permit individuals with visual impairments or other disabilities (observable or hidden) to be oriented to their location."

Recommendation: "KCATA should review and revise its automated stop list to include all stops where different bus routes converge, diverge, or cross and stops located after the route turns from one street to another."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 18, 29, and 30.

Finding: "Although it is MTA's policy to announce stops at transfer points, major intersections, and destination points, the policy does not include announcement of stops at sufficient intervals along the route to orient passengers as required by 49 CFR 37.167 (b)."

Finding: "The stop announcement lists included in the Stop Announcement Book appear to include most transfer points with other fixed routes and other major intersections and destination points. However, based on a sample of suburban

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routes, stop lists do not appear to include stops at intervals along the route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location.”

Recommendation: “It is recommended that MTA revise its policy regarding stop announcements to include announcement of stops at sufficient intervals along the route to orient passengers, as required by 49 CFR 37.167 (b), and expand its written policies to apply to all fixed route, rail and contracted private carrier bus services, in addition to MTA operated bus service. The revised policy should emphasize that stop announcements are required for compliance with the ADA.”

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 13, 14, and 15.

Finding: “The stop lists appear to be missing some transfer points; appear to be inconsistent from route to route; and appear to have long distances between some stops. As a result, transit riders with visual impairments or other disabilities may have difficulty in locating transfer points and orienting themselves to their location.”

Recommendation: “It is recommended that RT’s route announcement stop lists be reviewed and revised to assure that lists include all transfer points with other fixed routes, and intervals along the route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location, as well as other major intersections and destination points.”

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, pp. 13 – 14.

- 12** In this ADA compliance review, FTA found that stops announced by the automated system were not consistent with driver announcements.

Finding: “The list of stops to be announced by the automated system appears to be inconsistent with the list of stops to be announced that is provided to operators. Based on a review of eight routes, 92 stops were common to both lists of stops. There were an additional 75 stops on the operator lists that were not included on the automated list and 26 stops on the automated list that were not on the operator list.”

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Recommendation: "KCATA should revise the stop lists issued to operators to make them consistent with the automated stop lists."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 29 – 30.

- 13 Some of the issues discussed in this section are summarized from Easter Seals Project ACTION, Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators, *op. cit.*, pp. 31 – 34.
- 14 Easter Seals Project ACTION, Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators, *op. cit.*, pp. 29 – 30.
- 15 In some ADA compliance reviews, including these six, FTA addressed stop lists. In the first review, FTA lauded the transit agency stop lists. In the others, FTA found problems related to the preparation and use of stop lists.

Finding: "The 'Route Announcement' lists prepared by CATA with consumer input appear to include major stops and sufficient stops for riders to remain oriented as to their location."

Federal Transit Administration ADA Compliance Review of Capital Area Transportation Authority (CATA), Lansing, Michigan, *op. cit.*, p. 11.

Finding: "MTA does not require operators to announce all of the stops on its stop list but rather leaves it up to each driver to determine which stops to call to meet MTA's policy. In the absence of a requirement for drivers to announce specific stops it can be very difficult to hold drivers accountable for stop announcement performance."

Recommendation: "It is recommended that MTA revise its procedures to implement the stop calling policy to specifically require calling out all stops on MTA's stop list."

Recommendation: "It is recommended that stop lists be distributed to drivers with each new work schedule and that lists be made available to operators at each bus division."

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Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 13 and 15.

Finding: "The stop announcement lists contained in the *ADA Announcement Handbooks* do not appear to meet the requirements of the ADA regulations. Many appear to be missing stops that should be included. The #700 series fixed routes operated by private carriers do not have stop announcement lists."

Recommendation: "The MBTA should review and update the stop announcement lists to include all major intersections, transfer points, major destinations, and at sufficient intervals to orient passengers. Attention should be paid to making these announcement lists consistent among routes covering the same area and the lists are free of errors. This review should include input from the Advisory Committee."

Federal Transit Administration ADA Compliance Review of Massachusetts Bay Transportation Authority (MBTA), Boston, Massachusetts, *op. cit.*, pp. I-1-20 and I-1-21.

Finding: "Bus drivers do not have a list of stops that are to be announced. Instead, SEPTA's procedure is to call out all stops within Center City and at major intersections, activity centers, and transfer points. The absence of stop lists can result in inconsistency in announcing stops and confusion to customers who are visually impaired. Stop lists are being prepared for each route for the automated stop announcement system. Consumers were involved in the development of the automated system to determine appropriate audio levels for on-board announcements."

Recommendation: "It is recommended that SEPTA's procedures be revised to require bus drivers to announce all stops on the lists being developed for the automated system when operating buses that do not yet have the automated system. This will improve uniformity of stop announcement practices and eliminate the inconsistencies among drivers. SEPTA should consider eliminating its megaphone program, which appears to be confusing to drivers and passengers."

Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *op. cit.*, pp. 26 – 27.

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Finding: "Bus drivers do not have a list of stops that are to be announced. Instead, Pace instructs its drivers to call out stops at major intersections, at transfer points, and at major destinations. The absence of stop lists can result in inconsistency in announcing stops and potential confusion for riders."

Recommendation: "It is recommended that Pace's procedures be revised to require operators to announce all stops on the lists being developed for the IBS automated system when operating buses that do not yet have the automated system. This will improve uniformity of stop announcements, and eliminate inconsistencies among drivers, thereby making it easier for customers to orient themselves."

Federal Transit Administration ADA Compliance Review of Pace Suburban Bus Division of the Regional Transportation Authority (PACE), Arlington Heights, Illinois, *op. cit.*, p. 16.

Finding: "Some drivers indicated that stop lists were not readily available. Supervisors indicated that it is PAT's practice to provide stop lists to drivers at each driver work schedule change but this practice had been temporarily suspended during transition to a new bus stop inventory system."

Recommendation: "It is recommended that PAT clarify its procedures to implement the stop calling policy to specifically require calling out all stops on the stop list. Stop lists should be available on a continual basis at each garage where the driver checks out to begin the run in addition to being distributed to drivers upon picking new work schedules."

Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, p. 13.

- 16** Several FTA ADA compliance reviews, including these two, have found problems with transit agencies keeping stop lists current.

Finding: "KCATA issues a list of stops to be announced, with changes as they occur, to operators in a ring-bound handbook. Road Supervisors, who are responsible for field location of bus stops, are responsible for reporting changes to schedulers, who maintain the stop lists. According to KCATA managers, road supervisors do not always report stop changes. This can result in inaccurate stop lists."

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Recommendation: "KCATA should require road supervisors and all other employees who change bus stop locations to report such changes in a timely fashion to the scheduling department for inclusion in the HASTUS database."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 18 – 19.

Finding: "MTA has stop lists developed by the Training Department. The stop list is in the form of a book, which is updated yearly or less frequently because of printing costs. As a result the stop lists for many routes is out of date. Also, the current book is missing a number of routes. MTA is also developing stop lists to support its automated stop announcement system."

Recommendation: "It is recommended that MTA consider updating stop announcement lists individually for each route as service changes take place. Use of individual sheets for each route rather than use of a book with all routes can make it easier to maintain current stop lists and avoid costly and time consuming printing of a complete book each time a route change is made."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 14 and 15.

- 17** Many FTA ADA compliance reviews, including these five, found problems with stop announcements being sufficiently audible.

Finding: "Voice announcements made without amplification often were not audible or clear."

Finding: "PA announcements sometimes were difficult to understand or 'scratchy.'"

Recommendation: "PA systems should be repaired or replaced and kept in good working condition so that drivers may use them and be heard when announcing stops on fixed route buses. Further, PA systems on rapid transit/subway and commuter rail should be upgraded so that drivers are more easily understood and there is less static."

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Federal Transit Administration ADA Compliance Review of Massachusetts Bay Transportation Authority (MBTA), Boston, Massachusetts, *op. cit.*, pp. I-1-20 and I-1-21.

Finding: "Stop announcements on buses were significantly more audible when the PA system was used than when unassisted voice was used to make the announcements. The PA system was used on 15 (33%) of the 45 bus trips observed by the assessment team. In the 13 observations when the bus PA system was used, stop announcements were audible 11 (85%) times. Of 25 stop announcements made on buses by unassisted voice 13 were audible 9 were somewhat audible and 3 were inaudible."

Finding: "On 12 LRT trips the PA system was audible 7 times (58%) and somewhat audible 4 times (33%)."

Recommendation: "It is recommended that the importance of using the PA system, when available, to make stop announcements, be emphasized to operators by both trainers and transportation supervisors."

Recommendation: "It is recommended that the performance of the PA equipment for buses be assessed to assure its reliability given the apparent high level of required maintenance."

Recommendation: "It is recommended that the PA equipment used on LRVs be reviewed to improve the audibility of stop announcements."

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, pp. 13 – 14.

Finding: "Voice announcements made without amplification by drivers were sometimes not audible or clear. On three of the ten routes where voice announcements were observed, the announcements were not clear and audible."

Recommendation: "Options for being able to activate and use a PA system to amplify voice announcements should be explored. This should be explored for existing buses as well as for future purchases. CATA staff noted that 10 newer buses might be able to be easily modified to allow the PA system to be used separate from the DataGuide system."

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Federal Transit Administration ADA Compliance Review of Capital Area Transportation Authority (CATA), Lansing, Michigan, *op. cit.*, pp. 11 – 12.

Finding: "Fourteen (56%) of the stop announcements that were made were made by unassisted voice. Ten (40%) were made using the PA system. Ninety-three percent of the voice announcements were audible while 50% of the announcements using the PA were audible."

Federal Transit Administration Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, p. 14.

Finding: "On 3 bus trips (9%) some stops were announced and the announcements were audible. On 4 bus trips (12%) some stops were announced and the announcements were somewhat audible. On 4 (67%) of the observed MARC commuter rail trips, all stops were announced and were audible. Also on 4 (31%) of the Metro rapid rail trips and 4 (27%) of the LRT trips all stops were announced and were audible."

Finding: "For those trips on which at least some announcements were made, announcements were audible on all 6 (100%) of the MARC trips, on 67% of the LRT, 43% of MTA bus trips, and 36% of METRO trips."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, p. 13.

- 18 U.S. Access Board, Draft Revisions to the ADA Accessibility Guidelines for Buses and Vans, § T705, available at [www.access-board.gov/vguidedraft2.htm](http://www.access-board.gov/vguidedraft2.htm) (Notice of Availability at 73 Fed. Reg. 69592 (Nov. 19, 2008)). The U.S. Access Board is currently in an extended process of drafting and receiving public comment on proposed revisions to ADA accessibility guidelines for vehicles used to provide designated and specified public transportation. The first draft of such updated vehicle guidelines was released on April 11, 2007. Following public comment on that first draft, the second draft (cited here) was released on November 19, 2008. A formal Notice of Proposed Rulemaking (NPRM) will then be issued, leading to promulgation of a final rule after comments to the NPRM are analyzed.
- 19 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 25.

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**20** Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, op. cit., p. 25.

**21** Several FTA ADA compliance reviews, including this one, found that drivers did not make stop announcements when the automated system was malfunctioning.

Finding: "Drivers were observed to not consistently make voice announcements when the automated system was not functioning. Voice announcements were observed for only 74 of the 436 stops that were not announced automatically."

Recommendation: "CATA should re-emphasize the need for operators to provide manual back up should the automated system fail to completely and accurately announce stops. Specific guidance for operators detailing the circumstances under which voice announcements should be made should be developed. This guidance should be incorporated into the Work Rules and into training materials."

Federal Transit Administration ADA Compliance Review of Capital Area Transportation Authority (CATA), Lansing, Michigan, *op. cit.*, p. 11.

**22** Several FTA ADA compliance reviews, including the four below, found problems with automated stop announcement systems. Also, the National Council on Disability found a number of problems with automated announcement technology, including intentional disabling of the system or turning down of the volume by drivers, and improper triggering of announcements at the wrong time. National Council on Disability, *The Current State of Transportation For People With Disabilities in the United States*, June 13, 2005, pp. 27 – 28.

Finding: "CDTA managers have noted vandalism on the speaker wires for the internal bus speakers. Based on the location of these wires, they believe that drivers may have cut the wires."

Recommendation: "CDTA should consider more aggressive discipline of its drivers for failing to announce stops or make route identifications."

Federal Transit Administration ADA Compliance Review of Capital District Transportation Authority, Albany, New York, *Review of Stop Announcement and Route Identification Efforts*, conducted March 27 – 30, 2006, Final Report dated February 7, 2006 [sic], p. 16, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3899.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3899.html).

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Finding: "Stop announcements outside of downtown Kansas City made by the automated system are often made too close or even after the bus stop. In calibrating the time when the automated system makes the stop announcements, KCATA does not appear to fully account for the higher speeds that buses are traveling outside of downtown Kansas City."

Finding: "There appears to be a large number of vehicles with automated stop announcement systems that are either not turned on or are not reported and recorded as needing repair. The automated stop announcement equipment was not working on 14 (24 percent) of the 58 buses observed. Assuming the same failure rate for all KCATA vehicles, approximately 53 of the approximately 220 buses used in daily service will have inoperable automated announcement systems. ... An average of 10.6 automated stop announcement systems are repaired per week or 2 or 3 repairs per day. The discrepancy between 53 inoperable systems and two to three daily repairs indicates that many systems are either operational and not turned on properly, or inoperable and not reported and recorded as in need of repair."

Finding: "About half of the operators were not aware that the buses had a public address system that could be used for voice announcements."

Recommendation: "KCATA should review the timing of stop announcements made by the automated system, particularly outside downtown Kansas City, so that they are made sufficiently early for a passenger to signal a stop request and for the operator to make the stop safely."

Recommendation: "KCATA should establish a procedure to monitor operator inspections of automated stop announcement systems. Spot checks of vehicles by road supervisors or inspections by starters or mechanics after pull-in are two possible methods for spot checks. Operators who fail to properly inspect and report problems should be subject to remedial action as a means of improving reporting of automated systems that are not operating properly."

Recommendation: "KCATA should train and re-train its operators in the proper use of the public address system."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 30 – 31.

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Finding: "Automated announcements, using synthesized, computer-generated speech, were not always clear. On two of the five routes where automated announcements were observed, the announcements could not be clearly understood by the reviewers and on one route the announcements could be understood only some of the time."

Federal Transit Administration ADA Compliance Review of Capital Area Transportation Authority (CATA), Lansing, Michigan, *op. cit.*, p. 11.

Finding: "Only 1 out of 8 observed automated stop announcement equipped buses was working properly. The new automated stop announcement system is currently being phased into operation. Accuracy is expected to improve as system corrections are made. The stop announcements are sometimes made in the wrong location."

Recommendation: "It is recommended that PAT fully test the automated stop announcement system before final acceptance from the equipment supplier to assure that stops are called at the correct location. An alternative procedure to use of the automated system for stop announcements in the CBD should be implemented if the automated system proves unreliable in this area. MTA should be prepared to quickly implement a back-up procedure, such as driver voice announcements, if needed."

Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, pp. 14 and 15.

- 23 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 37.
- 24 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 38.
- 25 Several FTA ADA compliance reviews, including these two, found problems with maintenance of public address systems.

Finding: "Two of twelve operators interviewed said that they report a malfunctioning public address system when identified; the other ten operators said that they do not."

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Recommendation: "KCATA should train and re-train its operators in the proper use of the public address system."

Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, p. 30.

Finding: "Based upon driver interviews, it appears that approximately half of the gooseneck PAs on older buses are working."

Finding: "Neither the MTA Vehicle Report nor the checklist for Major Inspections, specifically includes PAs among the vehicle systems to be inspected."

Finding: "It does not appear that defective PAs are recorded into a maintenance tracking system at the time that a defect is first observed and that the time required for repair is recorded."

Recommendation: "It is recommended that PA systems be added to the checklist on both the Vehicle Report and the checklist for Major Inspections; and that operators and maintenance personnel be instructed to test PAs and report defective systems."

Recommendation: "It is recommended that defective PAs be recorded in a maintenance tracking system at the time that a defect is first observed and that the repair be tracked in that system."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 14 and 15.

- 26** In several FTA ADA compliance reviews, including this one, FTA found that instead of identifying the bus route to all waiting passengers at every stop, drivers stopped only in response to waiting passengers who signaled their interest in boarding.

Finding: "A number of operators were observed stopping only in response to a signal from waiting customers."

Recommendation: "In addition to monitoring driver performance for making route announcements and disciplining operators for failing to make route announcements ... KCATA should implement monitoring and discipline to address operator failure to stop where people are waiting at the bus stop."

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Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, p. 34.

- 27 U.S. Access Board, Draft Revisions to the ADA Accessibility Guidelines for Buses and Vans, § T704, available at [www.access-board.gov/vguidedraft2.htm](http://www.access-board.gov/vguidedraft2.htm) (Notice of Availability at 73 Fed. Reg. 69592 (Nov. 19, 2008)), *op. cit.*
- 28 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 34.
- 29 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 19.
- 30 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 28.
- 31 Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 24.
- 32 National Council on Disability, *The Current State of Transportation For People With Disabilities in the United States*, June 13, 2005, pp. 97 – 99.
- 33 This requirement is not in the DOT ADA regulation, but rather in what is called Part 27. Part 27 contains other transit agency obligations including the DOT regulation for Section 504 of the Rehabilitation Act of 1973, another disability rights law. Part 27, which is formally cited as 49 C.F.R. Part 27, is available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3907.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3907.html). The reporting requirement is at 49 C.F.R. § 27.13(b), 49 C.F.R. Subpart C, §§ 27.121 – 27.129.
- 34 Federal Transit Administration Office of Civil Rights, *Rider Complaint Form*, available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3889.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3889.html).
- 35 Several FTA ADA compliance reviews, including these three, found a lack of detailed written policies to address each ADA stop announcement and route identification requirement.

Finding: “RT policies and procedures regarding stop announcements as presented in RT’s Operator’s Manual and District Guide to ADA Regulations contain some inconsistencies and are not fully consistent with the language in the regulations.”

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Finding: "RT policies and procedures, as described in the Operator's Manual and District Guide, do not appear to be clear and could be construed to limit stop identification by the operator to situations in which a person who appears to be blind is waiting for a vehicle or to instances in which the vehicle is equipped with an external PA system."

Recommendation: "It is recommended that RT review and revise its Operators Manual, District Guide to ADA Regulations and other document that present RT's stop announcement policies and procedures in order to make clear that stops are to be announced in accordance with 49 CFR Section 37.167. The revised language and materials should be consistently presented in driver training."

Recommendation: "It is recommended that RT revise its Operators manual and District Guide to clearly describe its procedures regarding route identification. The policy should clearly identify procedures that provide a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter, or be identified to the vehicle operator as a person seeking a ride on a particular route, where vehicles for more than one route serve the same stop."

Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, pp. 13 – 14 and 18 – 19.

Finding: "The ADA requirement for route identification does not appear to be included in Pace policy notices and training materials."

Recommendation: "It is recommended that training materials and policy manuals be modified to more clearly describe the requirements for external route identification. Specifically, the practice of identifying the route and destination at transfer locations should not be limited to times when a waiting passenger has a white cane or guide dog. Many persons with disabilities, including those with developmental disabilities and some with visual impairments, are not always recognizable."

Federal Transit Administration ADA Compliance Review of Pace Suburban Bus Division of the Regional Transportation Authority (PACE), Arlington Heights, Illinois, *op. cit.*, pp. 20 – 21.

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Finding: "MTA policies do not appear to reflect the ADA requirement to identify transit routes to passengers waiting at stops served by more than one route. MTA Managers appear to be unaware or unclear as to the requirement to identify routes to customers."

Recommendation: "It is recommended that MTA revise or clarify its policy to include identification of routes to waiting passengers at bus and LRT stops shared by more than one route in accordance with 49 CFR 37.167(c). These policy revisions should be included in MTA work rules as appropriate."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, p. 20.

- 36** Many FTA ADA compliance reviews, including these six, addressed transit agency monitoring and discipline in the area of stop announcement and route identification. In the first two compliance reviews, FTA lauded the transit agency stop announcement and/or route identification monitoring and disciplinary efforts, in whole or in part. In the others, FTA identified deficiencies.

Finding: "Contracted ride checkers appear to be effective in identifying drivers who are not making stop announcements. RT used contracted ride checkers to monitor approximately 300 bus trips made by its 350 drivers in 1999. Ride checkers identified 89 drivers who failed to make stop announcements."

Finding: "RT appeared to aggressively discipline drivers who failed to make stop announcements. Through a progressive discipline program, 64 drivers who failed to make stop announcements were reprimanded, 22 were suspended and 3 were terminated."

Recommendation: "It is recommended that RT continue its progressive discipline program coupled with retraining, for failure to make stop announcements."

Recommendation: "It is recommended that the progressive discipline program also be applied for failure to use the PA system on buses."

Recommendation: "It is recommended that RT consider implementing a program to provide positive feedback to bus drivers who properly announce stops."

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Federal Transit Administration ADA Compliance Review of Sacramento Regional Transit District (RT), Sacramento, California, *op. cit.*, pp. 14 – 15.

Finding: "Pace has developed an extensive service-monitoring program that, among other things, evaluates whether stop announcements are being made. From July 2000 through June 2001, the monitors cited 371 drivers for failing to make stop announcements or not using the PA."

Finding: "Pace does not monitor drivers for compliance with the ADA route identification requirements."

Recommendation: "It is recommended that Pace continue its monitoring program. Once the stop announcement lists have been put into effect, the monitoring staff should evaluate stop announcement practices based on whether drivers are announcing all stops on the list."

Recommendation: "It is recommended that monitoring external announcements be incorporated into the Service Monitoring Program."

Federal Transit Administration ADA Compliance Review of Pace Suburban Bus Division of the Regional Transportation Authority (PACE), Arlington Heights, Illinois, *op. cit.*, pp. 16, 20, and 21.

Finding: "KCATA does not monitor operator performance in making route announcements at stops shared by more than one route."

Finding: "It appears that KCATA does not include failure to make route announcements at stops shared by more than one route in its operator discipline and remediation program."

Recommendation: "KCATA should include operator performance in making route announcements at stops shared by more than one route in its operator monitoring programs."

Recommendation: "KCATA should include failure to make route announcements at stops shared by more than one route in its operator discipline and remediation program."

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Federal Transit Administration ADA Compliance Review of Kansas City Transportation Authority (KCATA), Kansas City, Missouri, *op. cit.*, pp. 18 and 19.

Finding: "Although MTA conducts some operator performance monitoring, the agency does not appear to monitor bus stop announcements sufficiently to measure operator performance."

Finding: "There is no category for stop announcements in MTA's complaint tracking reports."

Finding: "MTA has a five-step progressive discipline program. Records of discipline violations and remedial actions are not tracked in a central system. The absence of a central tracking system makes it difficult to assess MTA's remediation for stop announcement violations."

Recommendation: "It is recommended that MTA establish a regular, consistent program to monitor bus stop announcements to permit accurate identification of performance and support remedial action for violations. MTA may want to consider hiring temporary personnel to prevent easy identification of monitors by operators. It is recommended that monitoring be sufficient to review each operator at least once per year."

Recommendation: "It is recommended that MTA's complaint tracking system explicitly include stop announcements."

Recommendation: "It is recommended that discipline violations and remedial actions be tracked in a central system to track follow-up on stop announcement violations. If operator confidentiality is an issue in designing such a system, operator identification could be suppressed in summary performance reports."

Federal Transit Administration ADA Compliance Review of Maryland Mass Transit Administration (MTA), Baltimore, Maryland, *op. cit.*, pp. 14 – 16.

Finding: "The Quality Control Section of SEPTA does not currently monitor compliance with the ADA route identification requirement."

Recommendation: "It is recommended that monitoring external announcements be incorporated into the Quality Control Monitoring Program."

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Federal Transit Administration ADA Compliance Review of Southeastern Pennsylvania Transportation Authority (SEPTA), Philadelphia, Pennsylvania, *op. cit.*, p. 31.

Finding: "It appears that Quality Assurance Monitors may be overstating the number of drivers who are making stop announcements. PAT reported 61% of drivers making all stop announcements versus 15% observed by the assessment team."

Finding: "It appears that some observations of stop announcements by Quality Assurance Monitors may not be entered into the QAO Reporting Systems. The number of entries for no stop announcements is far below what would be expected based upon assessment team observations."

Finding: "While PAT appears to do a good job of commending drivers who make stop announcements, it appears that PAT takes limited remedial action with drivers who fail to make stop announcements. PAT took no action with 64 of 67 drivers who made no stop announcements at West Mifflin Garage in 1999."

Recommendation: "It is recommended that PAT implement a central reporting and monitoring system for tracking driver compliance to ADA stop announcement requirements (as opposed to the existing system of separate tracking at each garage)."

Recommendation: "It is recommended that QAO reports from monitors be entered into a tracking system before distribution to garages for remedial action."

Recommendation: "PAT should consider more aggressive remediation of drivers who fail to make stop announcements. Otherwise, failure to make announcements may be considered an acceptable practice by many drivers. Likewise, PAT should continue to commend drivers that make stop announcements in compliance with PAT policy."

Federal Transit Administration ADA Compliance Review of Port Authority of Allegheny County (PAT), Pittsburgh, Pennsylvania, *op. cit.*, pp. 14 – 16.

- 37** Easter Seals Project ACTION, *Resource Guide to Effective Approaches for Increasing Stop Announcements and Route Identification by Transit Operators*, *op. cit.*, p. 54.

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**38** This requirement is not in the DOT ADA regulation, but rather in what is called Part 27. Part 27 contains other transit agency obligations including the DOT regulation for Section 504 of the Rehabilitation Act of 1973, another disability rights law. Part 27, which is formally cited as 49 C.F.R. Part 27, is available at [www.fta.dot.gov/civilrights/ada/civil\\_rights\\_3907.html](http://www.fta.dot.gov/civilrights/ada/civil_rights_3907.html). The reporting requirement is at 49 C.F.R. § 27.13(b), 49 C.F.R. Subpart C, §§ 27.121 – 27.129.